

THE HONORABLE DAVID G. ESTUDILLO

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

AARON WILLIAMS, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

PILLPACK LLC,

Defendant.

Case No. 3:19-cv-05282-DGE

**STIPULATED MOTION AND
ORDER TO EXTEND CASE
DEADLINES**

STIPULATION

Plaintiff Aaron Williams and Defendant PillPack LLC (“PillPack”) jointly request that the Court extend the deadline for sending notice of the class settlement to Settlement Class Members, and the other settlement-related deadlines, as described below. The requested extensions are necessary due to the Settlement Administrator’s delays in completing reverse lookups and analyzing other available data to identify the correct set of Settlement Class Members and their email and mailing addresses.

Specifically, the Settlement Agreement requires the Settlement Administrator to use PillPack’s user profile information, responses to wireless carrier subpoenas previously issued by Plaintiff, and industry standard practices, including reverse lookups, to identify names and contract information for the individuals on the class list. Dkt. 341-1 (“Settlement Agreement”)

¶ 3.3.1. Plaintiff provided the complete list of telephone numbers for the Settlement Class Members identified by Plaintiff’s expert on August 26, 2024. PillPack provided its supplement

1 of user profile data associated with those telephone numbers within 10 days after preliminary
2 approval, as required under Section 2.3 of the Settlement Agreement.

3 On October 8, 2024, Plaintiff requested that the Settlement Administrator provide to the
4 parties the final notice list in advance of the October 17, 2024 deadline to send class notice. On
5 October 9, 2024, the Settlement Administrator provided a list that lacked sufficient information
6 for the parties to confirm that the list included the correct universe of Settlement Class Members.
7 On October 14, 2024, in response to the parties' follow-up requests, the Settlement
8 Administrator provided an updated notice list that omitted several thousand class phone
9 numbers, apparently because the Settlement Administrator had relied on an outdated class notice
10 list.¹

11 Upon recognizing that sending notice as reflected in the Settlement Administrator's
12 notice list would be deficient, the parties immediately addressed the issue with the Settlement
13 Administrator and instructed the Settlement Administrator to halt sending class notice until it can
14 create a corrected class notice list that (1) includes the best available email and mailing addresses
15 for all Settlement Class Members and (2) fully complies with the Settlement Agreement and the
16 Court's Preliminary Approval Order (Dkt. 342). However, to complete the work required to
17 provide the best notice practicable to Settlement Class Members, the Settlement Administrator
18 estimates that it needs between one and two weeks to complete reverse lookups and generate the
19 final and complete settlement class notice list. The parties will need time to verify that the
20 updated class notice list is correct and resolve any outstanding issues with the Settlement
21 Administrator. The Settlement Administrator will then need six business days to prepare, print,
22 and send notice.

23 Accordingly, the parties request that the settlement-related deadlines be adjusted as
24 follows:

25 ¹ Counsel for the parties have confirmed that the Settlement Administrator used the correct list
26 for purposes of informing state and federal officials about the likely state of residence for class
27 members and therefore timely provided accurate notice under the Class Action Fairness Act
(CAFA).

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Deadline to send settlement class notice	October 17, 2024	November 21, 2024
Due date for motion for attorneys' fees, costs, and service award	November 15, 2024	Unchanged
Deadline to submit claims	December 16, 2024	January 20, 2025
Deadline to submit objections	December 16, 2024	January 20, 2025
Deadline to submit exclusions	December 16, 2024	January 20, 2025
Due date for Administrator to complete review of claim forms	January 13, 2025	February 17, 2025
Deadline for Administrator to send claim form deficiency notices	February 4, 2025	March 11, 2025
Deadline for Administrator declaration regarding notice, claims, and opt-outs	February 20, 2025	March 27, 2025
Final Approval Hearing	March 6, 2025	On or after April 10, 2025

The parties request that the Court set the final approval hearing for the earliest available date on or after April 10, 2025. If the above deadlines are extended as the parties request, the parties believe that the remaining deadlines as reflected in the Preliminary Approval Order and Settlement Agreement may remain as described, given that each is determined by reference to other settlement events that have not yet occurred.

RESPECTFULLY SUBMITTED AND DATED this 17th day of October, 2024.

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Attorneys for Defendant

ORDER

The Parties' stipulated motion to extend the settlement-related deadlines is GRANTED.

The settlement-related deadlines are extended as follows:

EVENT	DEADLINE
Deadline to send settlement class notice	November 21, 2024
Due Date for motion for attorneys' fees, costs, and service award	Unchanged
Deadline to submit claims	January 20, 2025
Deadline to submit objections	January 20, 2025
Deadline to submit exclusions	January 20, 2025
Due Date for Administrator to complete review of claim forms	February 17, 2025
Deadline for Administrator to send claim form deficiency notices	March 11, 2025
Deadline for administrator declaration regarding notice, claims, and opt-outs	March 27, 2025
Final Approval Hearing	April 18, 2025, at 9:00 a.m.

IT IS SO ORDERED.

Dated this 21st day of October, 2024.



David G. Estudillo
United States District Judge